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1 Honorable James L. Robart 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 THE HUMAN RIGHTS DEFENSE CENTER and MICHELLE DILLON, No. 2:18-cv-01442-JLR 11 Plaintiffs. JOINT STATUS REPORT AND 12 [PROPOSED] ORDER 13 Noted on Motion Calendar U.S. DEPARTMENT OF HEALTH AND October 9, 2019 14 **HUMAN SERVICES, ADMINISTRATION** FOR CHILDREN AND FAMILIES, and 15 OFFICE OF REFUGEE RESETTLEMENT, 16 Defendants. 17 18 Plaintiffs THE HUMAN RIGHTS DEFENSE CENTER ("HRDC") and 19 MICHELLE DILLON (collectively, "Plaintiffs") and Defendants U.S. DEPARTMENT OF 20 HEALTH AND HUMAN SERVICES, ADMINISTRATION FOR CHILDREN AND 21 FAMILIES and OFFICE OF REFUGEE RESETTLEMENT (collectively, "Defendants") 22 hereby provide the Court with a Joint Status Report pursuant to the Court's September 12, 23 2019 Order (Dkt. No. 38). 24 Since the last Joint Status Report, filed on September 10, 2019, the Defendants have 25 produced what they represent to be all spreadsheet summaries of responsive Serious 26 Incident Reports. Defendants have also indicated that they anticipate making an interim

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1 production of claim and complaint records responsive to Plaintiffs' Freedom of Information 2 Act requests before the end of October and that they anticipate all such responsive records 3 will be produced within 90 days. 4 Plaintiffs currently are evaluating the spreadsheet summaries of Serious Incident 5 Reports. Plaintiffs are also awaiting both the interim and final production of claim and 6 complaint records. 7 *In light of Defendants' representation that all Serious Incident Report spreadsheet 8 summaries have been produced and that responsive claim and complaint documents will be 9 produced within 90 days, and in light of the Plaintiffs' ongoing evaluation of the documents 10 produced to date and anticipated evaluation of the documents to be produced, the parties 11 propose that a joint status report be filed approximately 90 days from today, on or before 12 January 9, 2020. 13 Dated: October 9, 2019 Respectfully submitted, 14 ARETE LAW GROUP PLLC 15 By: /s/ Jeremy E. Roller 16 Jeremy E. Roller, WSBA No. 32021 1218 Third Avenue, Suite 2100 17 Seattle, WA 98101 Telephone (206) 428-3250 18 Fax (206) 428-3251 iroller@aretelaw.com 19 20 **HUMAN RIGHTS DEFENSE CENTER** 21 By: /s/ Masimba M. Mutamba 22 Masimba M. Mutamba, pro hac vice William A. Trine Law Fellow & Staff Attorney 23 P.O. Box 1151 Lake Worth, FL 33460 24 Telephone (561) 360-2523 Fax (866) 735-7136 25 mmutamba@humanrightsdefensecenter.org 26 Attorneys for Plaintiffs The Human Rights Defense Center and Michelle Dillon

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1	[PROPOSED] ORDER W
2	It is hereby ORDERED that:
3	The parties shall submit a joint status report to the Court on or before January 9,
4	2020.
5	ie.
6	Dated this 15 day of October, 2019
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9	Honorable James L. Robart United States District Court Judge
10	Officed States District Court Judge
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2	CERTIFICATE OF SERVICE
3	I hereby certify that on this date, I electronically filed the foregoing document with
4	the Clerk of the Court using the CM/ECF system, which will send notification of such filing
5	to the following:
6	MICHELLE R. LAMBERT, NYS #4666657 Assistant United States Attorney
7	United States Attorney's Office
8	700 Stewart Street, Suite 5220 Seattle, Washington 98101
9	Phone: (206) 553-7970
10	Fax: (206) 553-4073 Email: michelle.lambert@usdoj.gov
11	Attorneys for Defendants
12	
13	DATED: October 9, 2019, at Seattle, Washington.
14	s/ Annabel Barnes
15	Annabel Barnes, Legal Assistant
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